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6 PAMELA S. STEVENS

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 PAMELA S. STEVENS, ) Case No.: 2:14-cv-01359-APG-VCF  
13 Plaintiff, )  
14 vs. ) UNOPPOSED MOTION TO AMEND  
15 CAROLYN W. COLVIN, Acting ) AND EXTEND BRIEFING  
16 Commissioner of Social Security, ) SCHEDULE  
17 Defendant )  
18 )

Plaintiff Pamela S. Stevens (“Plaintiff”) and defendant Carolyn Colvin,  
Commissioner of Social Security (“Defendant”), through their undersigned counsel  
of record, hereby stipulate, subject to the approval of the Court, to extend the time  
for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to March 6,  
2015; and that Defendant shall have until April 6, 2015, to file her opposition, if  
any is forthcoming. Any reply by plaintiff will be due April 27, 2015.

1 A second extension of time is needed because Plaintiff's Counsel's Spouse  
2 undergoes chemotherapy treatment for her Stage IV breast cancer which  
3 metastasized initially to her liver and continues to progress there and in her lungs,  
4 throat, and spine which required recent hospitalization to treat. Counsel requires the  
5 additional time to file the Joint Position Statement to allow him to devote the  
6 appropriate time to assist his Spouse and his two elementary school aged children  
7 through this obviously stressful experience. Counsel sincerely apologizes to the  
8 court for any inconvenience this may have had upon it or its staff.

9           Counsel for defendant has indicated, via e-mail, that this motion to extend  
10 the time to file is not opposed.

11 | DATE: January 27, 2015 Respectfully submitted,

## ROHLFING & KALAGIAN, LLP

/S/ *Marc V. Kalagian*

BY: \_\_\_\_\_  
Marc V. Kalagian  
Attorney for plaintiff PAMELA S. STEVENS

ORDER

IT IS SO ORDERED.

*Carl Becker*

**UNITED STATES MAGISTRATE JUDGE**

DATED: January 28, 2015